

1 JOHN A. VOS, ESQ. (#80790)
1430 Lincoln Avenue
2 San Rafael, CA 94901
(415) 485-5330
3 For Claimant
TEAM GOLDEN LINK AMERICA CORPORATION
4

5
6 UNITED STATES BANKRUPTCY COURT
7 SOUTHERN DISTRICT OF CALIFORNIA

8 In re:) No: 05-44481 (RDD)
9 DELPHI CORPORATION, ET AL,)
Debtor) (jointly administered)
10

11 RESPONSE TO OBJECTION TO CLAIM

12 Claimant Team Golden Link America Corporation responds to the
13 Second Omnibus Objection to its claim #849. Debtor's objection is
14 based upon the erroneous belief that such claim is duplicative.
15 Such claims is NOT duplicative.

16 Claimant filed three SEPARATE claims, for three separate
17 amounts. One claim is for \$91,766.83; one claim is for \$84,709.66;
18 one claim is for \$175,658.02. Merely because claimant filed three
19 claims does not mean that any of them are duplicates of each
20 other. Moreover, on their face each separate claims covered a
21 DIFFERENT PERIOD OF TIME as set forth on item #2 of such unique
22 and individual claims. The amounts being different, the period s
23 of time covered for each claim being different, the only
24 commonality between the claims is that each was submitted by the
25 same claimant FOR DISTINCT CLAIMS. Attached to such claims are
26 invoices supporting each of the separate claims. Similarly
27 attached to this Response are copies of such invoices, which
28 includes some of the documents which will be asserted in support

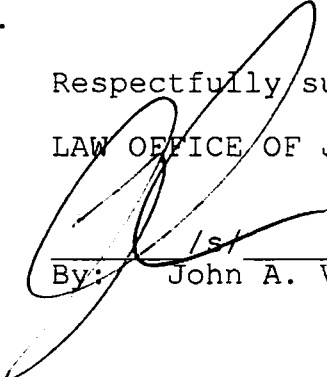
1 of such claims (complete documentation is too voluminous to
2 attach, and evidentiary proof includes non-documentary physical
3 items).

4 There is no duplication. The objection is patently
5 unsupported and should be denied.

6 Dated: November 18, 2006

Respectfully submitted,

LAW OFFICE OF JOHN A VOS

By:  /s/ John A. Vos, Esq.

United States Bankruptcy Court

District of Columbia

PROOF OF CLAIM

Name of Debtor

Delphi Corporation et. al.

Case Number

05 - 44481 (RDD)

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NOTE: This form should not be used to make a claim for an administrative expense arising after the commencement of the case. A "request" for payment of an administrative expense may be filed pursuant to 11 U.S.C. § 503.

Name of Creditor (The person or other entity to whom the debtor owes money or property):

TEAM PACIFIC CORPORATION, dba
Team Golden Link America

Name and Address where notices should be sent:

Team Golden Link America Corporation
1799 Old Bayshore Highway
Suite 135 Burlingame CA 94010-1316
U.S.A.

-- AND TO:

John A. Vos, Esq.
1430 Lincoln Avenue
San Rafael, CA 94901

Telephone Number:

(415) 485-5332

☐ Check box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars.

☐ Check box if you have never received any notices from the bankruptcy court in this case.

☐ Check box if the address differs from the address on the envelope sent to you by the court.

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Account or other number by which creditor identifies debtor:

Check here if this claim ☐ replaces or ☐ amends a previously filed claim dated: _____

1. Basis for Claim

☒ Goods sold☐ Services performed☐ Money loaned☐ Personal injury/wrongful death☐ Taxes☐ Other _____☐ Retiree benefits as defined in 11 U.S.C. § 1114(a)☐ Wages, salaries, and compensation (fill out below)

Last four digits of SS #: _____

Unpaid compensation for services performed

from _____ to _____
(date) (date)

2. Date debt was incurred:

5 Jul 02 - 28 Mar 05

3. If court judgment, date obtained:

4. Classification of Claim. Check the appropriate box or boxes that best describe your claim and state the amount of the claim at the time case filed. See reverse side for important explanations.

Secured Claim.

☐ Check this box if your claim is secured by collateral (including a right of setoff).

Brief Description of Collateral:

☐ Real Estate ☐ Motor Vehicle☐ Other _____

Value of Collateral \$ _____

Amount of arrearage and other charges at time case filed included in secured claim, if any: \$ _____

Unsecured Priority Claim.

☐ Check this box if you have an unsecured priority claim

Amount entitled to priority \$ _____

Specify the priority of the claim:

☐ Domestic support obligations - 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).☐ Wages, salaries, or commissions (up to \$10,000),* earned within 180 days before filing of the bankruptcy petition or cessation of the debtor's business, whichever is earlier - 11 U.S.C. § 507(a)(4).☐ Contributions to an employee benefit plan - 11 U.S.C. § 507(a)(5).☐ Up to \$2,225* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use - 11 U.S.C. § 507(a)(7).☐ Taxes or penalties owed to governmental units - 11 U.S.C. § 507(a)(8).☐ Other - Specify applicable paragraph of 11 U.S.C. § 507(a)(____).

* Amounts are subject to adjustment on 4/1/07 and every 3 years thereafter with respect to cases commenced on or after the date of adjustment.

Unsecured Nonpriority Claim \$91,766.83

☒ Check this box if: a) there is no collateral or lien securing your claim, or b) your claim exceeds the value of the property securing it, or if c) none or only part of your claim is entitled to priority.

5. Total Amount of Claim at Time Case Filed: \$91,766.83 (Unsecured) -0- (Secured) -0- (Priority) \$91,766.83 (Total)

* If all or part of your claim is secured or entitled to priority, also complete Item 5 or 7 below.

☐ Check this box if claim includes interest or other charges in addition to the principal amount of the claim. Attach itemized statement of all interest or additional charges.

6. Credits: The amount of all payments on this claim has been credited and deducted for the purpose of making this proof of claim.

7. Supporting Documents: Attach copies of supporting documents, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, court judgments, mortgages, security agreements, and evidence of perfection of lien. DO NOT SEND ORIGINAL DOCUMENTS. If the documents are not available, explain. If the documents are voluminous, attach a summary.

8. Date-Stamped Copy: To receive an acknowledgment of the filing of your claim, enclose a stamped, self-addressed envelope and copy of this proof of claim

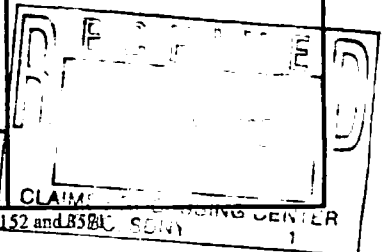
Date:

11/15/05

Sign and print the name and title, if any, of the creditor or other person authorized to file this claim (attach copy of power of attorney, if any):

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Penalty for presenting fraudulent claim: Fine up to \$500,000 or imprisonment for up to 5 years, or both. 18 U.S.C. §§ 152 and 157. SENY

TEAM PACIFIC CORPORATION		I			
DELPHI-DELCO OUTSTANDING INVOICES					
AS OF:	OCT 7, 2005				
IN US\$ DOLLAR					
Invoice		Invoice		Outstanding	
Number	Type	Date	Due Date	\$ Amount	Description / Remarks
1466	Invoice	5-Jul-02	4-Aug-02	180.60	Assy Fee - ASI-223 reprocess
1467	Invoice	5-Jul-02	4-Aug-02	1,847.86	Assy Fee - ASI-110 reprocess
1619	Invoice	26-Jul-02	25-Aug-02	205.30	Assy Fee - ASI-120 reprocess
1621	Invoice	26-Jul-02	25-Aug-02	84.35	Assy Fee - ASI-120 reprocess
1622	Invoice	26-Jul-02	25-Aug-02	695.52	Assy Fee - ASI-223 reprocess
1623	Invoice	26-Jul-02	25-Aug-02	867.58	Assy Fee - ASI-223 reprocess
1643	Invoice	27-Jul-02	26-Aug-02	1,445.92	Assy Fee - ASI-110 reprocess
D004747	DM-Ntrad	08/17/04		60,501.74	Cost of rework due to tolerance criteria
D005203	DM-Ntrad	03/28/05		25,927.96	Cost of rework due to tolerance criteria
TOTAL				\$ 91,766.83	